

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Andrew John-Mustaq Karjo

Case: 2:24-mj-30358

Assigned To : Unassigned

Assign. Date : 8/22/2024

Case No.

Description: RE: ANDREW KARJO  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 18, 2024 in the county of Macomb in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 875(c)

Threats made to cause injury and death.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: August 22, 2024City and state: Detroit, Michigan*Complainant's signature*Juan Herrera, Special Agent (FBI)*Printed name and title**Judge's signature*Hon. David R. Grand, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT OF JUAN M. HERRERA**

I, Juan M. Herrera, being duly sworn, depose and state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation and have been employed as such for approximately nineteen and a half years. I am currently assigned to the FBI Detroit, Macomb County Office. I am also assigned to the FBI Macomb County Gang and Violent Crime Task Force. During this time, I have investigated numerous violations of Federal law related to violent crimes to include violations associated with threatening communications.
2. This affidavit is made for the purpose of establishing probable cause that Andrew John-Moushtaq KARJO made threats to cause injury and death to Adult Victim One (AV-1), in violation of 18 U.S.C. § 875(c).
3. I make this affidavit based upon personal knowledge and experience, conversations with and communications from others who have personal knowledge of the events and circumstances described herein, the knowledge and experience of other investigators and law enforcement personnel, and information acquired during the investigation. This affidavit is being submitted for the limited purpose of establishing probable cause, and I have set forth only those facts necessary to do so.

### **PROBABLE CAUSE**

4. Adult Victim One (AV-1) is a police officer with the Utica Police Department and was working in that capacity on August 18, 2024.
5. On August 18, 2024, a person called the Utica Police Department (UPD). The caller said that she rented a pavilion at Grant Park in Utica for a party, and several individuals showed up to the same pavilion and occupied it. When the caller asked the individuals to leave the pavilion, they began smoking, drinking, and cursing at her, and she therefore called the police.
6. At approximately 5:00 p.m., Utica police officers, including AV-1, responded to Grant Park. The officers verified the caller had a permit to use the pavilion. They then asked the individuals, including a man later identified as Andrew John Moustaq KARJO, to leave the pavilion. KARJO became disorderly and was taken into custody. KARJO was taken to the Utica Police Department where he was booked, issued a citation for disorderly conduct, and released.
7. Later that day, the Utica Police Department received information from an anonymous caller that threats to an officer from the department had been posted on a Facebook account belonging to Andrew John-Moushtaq KARJO, using a unique profile screen name (KARJO Facebook Account) known to me through this investigation.

8. On August 19, 2024, I interviewed AV-1, who informed me that threatening and harassing messages towards him were posted on a Facebook account belonging to KARJO.

9. That same day, I viewed the KARJO Facebook Account that is publicly accessible to Facebook users. I determined that the profile photo associated with the account, as well as other photos posted by the user and located within the Facebook page, are of KARJO, which I confirmed by comparing the photos to a State of Michigan driver's license photo of KARJO.

10. During my review of the KARJO Facebook Account, I observed multiple posts indicating that KARJO is the user of the account, including (1) references to being arrested on August 18, 2024, which is the day when KARJO was arrested for disorderly conduct by UPD and AV-1; (2) references to August 18, 2024 being KARJO's thirtieth birthday, which was, in fact, KARJO's actual thirtieth birthday; (3) photographs of the citations issued by the Utica Police Department to KARJO on August 18, 2024, for Disorderly Person/Disorderly Conduct. In addition, I located a post listing the account user's phone number as 586-XXX-X918. A query of the Clear public source database revealed telephone number 586-XXX-X918 is an AT&T cellular telephone utilized by KARJO. Based on all of these observations and my other investigation, I believe that KARJO is the user of the account I reviewed.

11. I further observed multiple threatening messages toward AV-1 posted by the KARJO Facebook Account. Specifically, on August 18, 2024, between approximately 8:00 p.m. and 10:00 p.m., KARJO posted approximately twenty public messages referencing and/or threatening AV-1. The posts included the following statements:

- a. “People like that office[r] [AV-1] is why men like me kill, you want to see who’s tough not you pussy bitch come pull up 586-XXX-X918.”
- b. “[AV-1], That’s why you got lawsuits on you. Why are you a police officer!! Ima kill you nigga if the law don’t have you removed”
- c. “FUCK THE POLICE THAT’S WHY WE BEE KILLING YALL...”

12. In addition, the account included a screenshot from a video depicting what appears to be KARJO holding a long gun with the message, “#utica I got guns too.”

13. Further, I located public posts made by the KARJO Facebook Account listing home addresses for AV-1, with text stating in part, “...Not hard to find sure you’re in that area.” The posts also included photographs of AV-1 and his family.

14. Because the posts described above were posted publicly on Facebook via the internet, there is probable cause to conclude that the communications affected interstate commerce.

15. KARJO's course of conduct with respect to AV-1 has caused AV-1 to reasonably fear death or serious bodily injury, and would be reasonably expected to cause, and did cause, substantial emotional distress to AV-1's and his family.

### CONCLUSION

16. Based upon the facts set forth in this affidavit, there is probable cause to believe that, within the Eastern District of Michigan, Andrew John-Moushtaq KARJO did transmit, in interstate commerce, a communication which contained a threat to injure the person of another, specifically AV-1, in violation of Title 18, United States Code, Section 875(c).

Respectfully submitted,



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Juan M. Herrera  
Special Agent  
Federal Bureau of Investigation

Sworn to before me in my presence and  
or by reliable electronic means.



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Hon. David R. Grand  
United States Magistrate Judge

Dated: August 22, 2024